

motion.

The certificate must contain the names of participating counsel and the date and manner of consultation. The burden will be on moving counsel filing the motion to initiate the conference upon giving reasonable notice of time, place and specific nature of the conference. ...

Plaintiffs have attached a Certificate of Consultation to their Motion, but said Certificate does, and cannot, comply with Local Rule 7.2(a)(1)(B). Counsel for Plaintiffs never proposed a conference to discuss the issues raised in her Motion with counsel for Defendants. Additionally, as described below, Defendants have complied with Plaintiffs' voluminous requests.

On July 11, 2008, Defendants served its initial answers to Plaintiffs' Requests for Production of Documents. Included with those answers, Defendants provided over 380 pages of documents, including employee files and compensation information.


On July 29, 2008, at the deposition of Elizabeth Downey, the Chief Executive Officer of Defendant, UniTek USA, LLC ("Unitek"), Defendants supplemented its response by hand-serving another set of documents on Plaintiffs. These documents included hundreds of time sheets for the named Plaintiffs.

On August 26, 2008, Defendants once again supplemented its response to Plaintiffs' Request for Production by serving Plaintiffs with of more documents, which included hundreds of the requested routing sheets. On October 20, 2008, Defendants again supplemented its production of documents by providing Plaintiffs hundreds of more routing sheets.

Counsel for Defendants has consistently represented that Defendants will continue to supplement its production in response to Plaintiffs' burdensome and voluminous requests. As Plaintiffs are aware, since they continue to be employees of Defendant FTS, document

production can never be complete, given the ongoing nature of these claims. Nevertheless, without properly consulting with Defendants' counsel in violation of the Court's rules, Plaintiffs have burdened the Court with the instant, baseless Motion.

ELLIOTT GREENLEAF &
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/s/ Colin D. Dougherty
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DATED: October 27, 2008

Counsel for Defendants

CERTIFICATE OF SERVICE

I, Colin D. Dougherty, hereby certify that, on this date, I caused a true and correct copy of the foregoing to be served, by way of electronic mail upon the following:

Rachhana T. Srey, Esq.
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Attorney for Plaintiffs


COLIN D. DOUGHERTY

DATED: October 27, 2008